

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

VALLEY HEALTH SYSTEM, LLC, a
Delaware Limited Liability company, DVH
HOSPITAL ALLIANCE, LLC, a Delaware
Limited Liability company, and
SUMMERLIN HOSPITAL MEDICAL
CENTER, LLC, a Delaware Limited Liability
company,

Plaintiff,

v.

TRAVEL INSURANCE FACILITIES, PLC, a
Foreign Corporation, UNION
REISEVERSICHERUNG
AKTIENGESELLSCHAFT, a Foreign
Corporation,

Defendant.

CASE NO.: 2:22-cv-00365-ART-DJA

ORDER GRANTING

STIPULATION TO EXTEND
PLAINTIFFS' DEADLINE TO FILE
OPPOSITIONS TO DEFENDANTS'
MOTIONS TO DISMISS

(SECOND REQUEST)

Defendants TRAVEL INSURANCE FACILITIES, PLC and UNION
REISEVERSICHERUNG AKTIENGESELLSCHAFT ("Defendants") and Plaintiffs VALLEY
HEALTH SYSTEM, LLC; DVH HOSPITAL ALLIANCE, LLC, and SUMMERLIN HOSPITAL
MEDICAL CENTER, LLC ("Plaintiffs"), by and through their counsel of record, hereby
stipulate, agree, and request that the deadline for Plaintiffs to file oppositions to Defendants'
Motions to Dismiss (ECF Nos. 24 and 56) be extended by 45 days, up to and including
November 6, 2023.

Defendants filed Motions to Dismiss requesting dismissal primarily due to a lack of
personal jurisdiction. ECF Nos. 24 and 56. Plaintiffs requested leave to conduct limited

1 jurisdictional discovery relevant to the issue of personal jurisdiction, which the Court
2 granted on July 12, 2023. ECF No. 68. The Court initially provided Plaintiffs until
3 September 6, 2023 to file oppositions to Defendants' Motions to Dismiss. *Id.*

4 On August 14, 2023, the Court approved the parties' first request to extend the
5 deadline for Plaintiffs to file the Oppositions up to and including September 20, 2023, due
6 to Defendants' need for additional time to respond to Plaintiffs' Jurisdictional
7 Interrogatories. ECF No. 74.

8 On August 22, 2023, Defendants served their responses to Plaintiffs' Jurisdictional
9 Interrogatories. On September 6, 2023, counsel for the parties met and conferred
10 regarding alleged deficiencies in Defendants' responses. The parties are in the process of
11 working together to resolve this discovery dispute in good faith without the Court's
12 involvement. The parties anticipate reaching such a resolution within the next two weeks.
13 Assuming such an agreement is reached, Plaintiffs will then take the deposition of
14 Defendants' representatives to complete jurisdictional discovery, after which Plaintiffs will
15 prepare and file their oppositions to Defendants' Motions to Dismiss.

16 To maintain sufficient time for Plaintiffs to prepare their Oppositions to Defendants'
17 Motions to Dismiss, the parties hereby request that the deadline for Plaintiffs to file the
18 Oppositions be extended to November 6, 2023.

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20 *[signature page to follow]*
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The stipulation is made in good faith and not for purposes of delay.

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IT IS SO ORDERED.

DATED: September 22, 2023.



ANNE R. TRAUM
UNITED STATES DISTRICT JUDGE